## UNITED STATES DISTRICT COURT DISTRICT OF NEW JERSEY

IN RE: JOHNSON & JOHNSON TALCUM	) MDL No. 3:16-md-02738-MAS-RLS
POWDER PRODUCTS MARKETING,	)
SALES PRACTICES, AND PRODUCTS	)
LIABILITY LITIGATION	)
	)
THIS DOCUMENT RELATES TO:	)
	)
GRACE FLETCHER v. JOHNSON &	)
JOHNSON, et al.	)
	)
3:23-cv-22093	)

## **MOTION TO STAY PROCEEDING**

Counsel for Plaintiff Grace Fletcher hereby respectfully files this Motion to Stay Proceedings, pending substitution of a party for Plaintiff Grace Fletcher or entry of order of dismissal pursuant to F.R.C.P. 2(a).

On May 2, 2024, Counsel filed a Notice of Suggestion of Death for Plaintiff Grace Fletcher. F.R.C.P. 25(a) provides for the substitution of a party but does not specify whether a pending action is stayed. Because there is no party to prosecute the case since Plaintiff has died, and because no personal representative has been located, this case should be stayed until 90 days from the suggestion of death filed on May 2, 2024.

Wherefore, Plaintiff respectfully requests that the Court stay the proceeding until 90 days from the Notice of Suggestion of Death filed on May 2, 2024.

Dated: May 2, 2024 Respectfully submitted,

/s/ Jennifer R. Liakos Jennifer R. Liakos LIAKOS LAW, APC 955 Deep Valley Drive, Suite 3900 Palos Verdes Peninsula. CA 90274 (310) 961-0066 Jenn@jennliakoslaw.com

## **CERTIFICATE OF SERVICE**

I, hereby certify that on May 2, 2024, a copy of the foregoing MOTION TO STAY PROCEEDING filed via the Court's CM/ECF electronic filing system. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. Parties may access this filing through the Court's system.

/s/ Jennifer R. Liakos
Jennifer R. Liakos